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6 ALEXANDRU ION

7
8 UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF NEVADA

10
11 UNITED STATES OF AMERICA,)
12 Plaintiff,) Case No.: 2:12-cr-00004-APG-EJY
13 v.)
14 ALEXANDRU ION,)
15 Defendant.)
16 _____)

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18 **STIPULATION AND ORDER TO CONTINUE DUE DATE FOR JOINT STATUS**
19 **REPORT PURSUANT TO THE**
20 **COURT'S JULY 10, 2020 MINUTE ORDER IN CHAMBERS**
(First Request)

21 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant
22 ALEXANDRU ION, by and through his attorney (Richard J. Pocker, Esq. of the law firm of
23 Boies Schiller Flexner LLP), and the Plaintiff UNITED STATES OF AMERICA (hereinafter,
24 "the Government"), by and through its attorney Chad McHenry, Esq., Trial Attorney with the
25 U.S. Department of Justice Organized Crime and Gang Section of the Criminal Division, that
26 the deadline for submission of the Joint Status Report required by the Court's Minute Order in
27 Chambers dated July 10, 2020 (ECF #1679) be extended to and including July 27, 2020.

28 This Stipulation is entered for the following reasons:

1 1. On July 10, 2020 the Court issued its Minute Order in Chambers (ECF #1679).
2 The Minute Order advanced the Change of Plea Hearing with respect to Defendant ION from
3 July 31, 2020 to July 29, 2020. The Court expressed its intention to conduct that hearing by
4 ZOOM video conference provided that Defendant ION consented (after obtaining advice of
5 counsel) to proceeding in this manner, as opposed to a live in Court proceeding. The Court set
6 a deadline of July 22, 2020 by which the parties were required to submit a Joint Status Report
7 addressing questions and requests by the Court with respect to the Zoom video setting. It is this
8 latter deadline which the parties hereby seek to extend.

9 2. Defendant ION naturally would prefer that he appear in Court with the Court
10 and counsel present to change his plea. Nonetheless, he is also eager to advance the progress of
11 these proceedings in order to begin serving his sentence and promptly return to his home
12 country of Romania. Defendant ION also intends to seek the Court's permission to waive the
13 Presentence Investigation Report, and proceed directly to sentencing, preferably at the same
14 hearing at which he will be changing his plea. Based upon this consideration, as well as to the
15 fact that Defendant ION is not a native speaker of the English language, his counsel wishes to
16 have a few extra days to be absolutely sure it is Defendant ION's intent to proceed to plea and
17 potentially, to sentencing in the ZOOM video context. The Government has no objection to the
18 brief requested extension. The parties request that they have to and including July 27, 2020 in
19 which to file the Joint Status Report.

20 3. At the present time, granting the requested extension will have no impact on the
21 timing of the Change of Plea Hearing, set for July 29, 2020.

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1 4. This is the first request for an extension of the deadline for submitting the Joint
2 Status Report requested by the Court's July 10, 2020 Minute Order.

3 DATED this 23rd day of July, 2020.

4 BOIES SCHILLER FLEXNER LLP

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6 By: /s/ Richard J. Pocker

RICHARD J. POCKER, ESQ.
7 Counsel for Alexandru Ion

NICHOLAS TRUTANICH
United States Attorney

8
9 By: /s/ Chad McHenry

10 CHAD McHENRY, ESQ.
11 Trial Attorney with the U.S.
12 Department of Justice Organized
13 Crime and Gang Section of the
14 Criminal Division

ORDER

15 Based upon the pending Stipulation of counsel, and good cause appearing
16 IT IS HEREBY ORDERED that the due date for the Joint Status Report required by the
17 Court's Minute Order of July 10, 2020 is continued to July 27, 2020.

18 DATED this 23rd day of July, 2020.

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21 UNITED STATES DISTRICT JUDGE